

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MILLENNIUM FUNDING, INC. BODYGUARD	)	
PRODUCTIONS, INC. and LHF PRODUCTIONS,	)	
INC.,	)	23-CV-16372
	)	
Plaintiffs,	)	Hon. John F. Kness
	)	
v.	)	
	)	
MICHAEL A. HIERL and HUGHES SOKOL	)	
PIERS RESNICK & DYM, LTD.	)	
	)	
Defendants.	)	

**DEFENDANTS' AGREED MOTION FOR EXTENSION  
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants, MICHAEL A. HIERL (“Hierl”) and HUGHES SOKOL PIERS RESNICK & DYM, LTD. (“Hughes Socol”), by and through their attorneys, Joseph R. Marcon and Victor J. Pioli of JOHNSON & BELL, LTD., hereby move this Honorable Court pursuant to FED. R. CIV. P. 6(b) to grant an extension of 21 days through March 8, 2024 for Defendants to answer or otherwise plead to Plaintiff’s Amended Complaint at Law. In support of their motion, Hierl and Hughes Socol state as follows:

1. Plaintiffs have filed their complaint in this action alleging counts for breach of contract and equitable accounting against Hughes Socol and one of its attorneys, Hierl [ECF No. 1].
2. Hughes Socol was served with a summons and copy of the complaint in this matter on January 26, 2024. Hughes Socol’s responsive pleading is therefore due on February 16, 2024. Hierl has not been served.

3. In the interest of judicial economy and to expedite matters, undersigned counsel has now agreed to accept service on behalf of Hierl and has entered an appearance on Hierl's behalf on February 16, 2024. Therefore, Hierl's responsive pleading is now due on March 8, 2024.

4. This motion seeks to align the due dates for Hughes Socol's and Hierl's responsive pleadings to March 8, 2024. This would result in more efficient pleading and administration as it is anticipated that Hughes Socol and Hierl will file a joint pleading in response to the Complaint.

5. Counsel for Plaintiffs has been consulted and agrees with this motion and the relief sought herein.

WHEREFORE, Defendants, MICHAEL A. HIERL and HUGHES SOKOL PIERS RESNICK & DYM, LTD., respectfully request that this Honorable Court enter an order pursuant to FED. R. CIV. P. 6(b) granting them an extension of 21 days through March 8, 2024 to answer or otherwise plead to Plaintiff's Complaint.

Respectfully submitted,

MICHAEL A. HIERL and HUGHES  
SOKOL PIERS RESNICK & DYM, LTD

By: /s/ Victor J. Pioli  
One of Their Attorneys

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Victor J. Pioli